

# kix 107.5

8/26/96

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M. Street, N.W.  
Washington, D.C. 20554

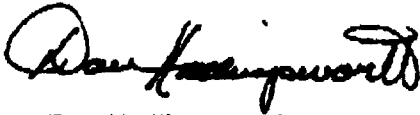
Ref: MM Docket No. 96-16

Dear Mr. Caton:

I am transmitting with this facsimile letter ten copies of the comments of Ruston Broadcasting Company, Inc., licensee of broadcasting stations KRUS and KXKZ in Ruston, Louisiana, in the Commission's proceeding relating to proposed revisions in its EEO rules and policies. Copies bearing facsimile signatures are being filed today, with the original to follow by mail.

Please contact me with any questions about this matter.

Sincerely,



Dan Hollingsworth  
Pres.  
Ruston Broadcasting Co., Inc.

No. of Copies rec'd 0210  
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Covering All of North Louisiana KIX 107.5 (KXKZ)

# KIX 107.5

8/26/96

Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: Docket # MM 96-16

Dear Chairman Hundt:

I am writing regarding public input to Docket # MM 96-16 because I feel that something positive needs to be done to give broadcasters wider latitude and discretion in applying the Commission's EEO policies, which in my view, fail to come to grips with the fundamental reality of the situation as well as being punitive in nature.

I have been in Broadcasting for over 42 years. Most of my career has been spent in small and medium markets. I have been owner of this station for 28 years. In that time, we have had exposure to all types of situations in implementing policies regarding EEO. When I first got into broadcasting, many of the radio stations had black employees and black on-air personalities. It is good business to have a diverse staff that can communicate with the varied segments of the marketplace and offer diverse points of view. It makes just as much sense now as then. It is not a question of whether stations want to hire minorities & women. It is a question of availability at the time you have an opening. We have people leave unexpectedly or resign and these people have to be replaced as soon as possible just to keep operating. Since there are no "pools" of qualified applicants ready-at-hand, it takes weeks to get responses to ads and letters attempting to get qualified applicants to apply.

The Small market broadcaster is especially caught in a trap. He or she must compete with larger market stations that come into his home market...must compete for personnel talent with larger markets..and must keep up with the paperwork and the advertising and turn every stone to find someone or some organization that might be a source of adequate minority or female referrals. In the meantime, the marketplace has changed. Small market broadcasters are virtually FORCED to automate or find satellite programming in order to cut personnel to remain in business. More and more, forced into tiny operations that require minimal multi-talented people to keep it all going. No longer in small markets is it good enough just to be an announcer or salesman or news person. It requires FEWER people doing many different jobs! This means the need for entry level employees is less and less from a full-time standpoint. In the major markets now, and even in most medium markets, the LMA thing and the multi-station buy outs are costing more and more jobs, particularly for those who are not multi-talented and experienced.

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The recent increase in the minimum wage will cost thousands of jobs for part-time employees in radio stations as stations will be forced further to automate and go satellite to stay in the black.

So, for those of us trying to stay alive in an increasingly hostile environment, just KEEPING good qualified people is a major problem. Getting NEW qualified people who can come in and HELP right away is an even larger problem.

I am the Manager, the Chief Operator, Program Director, and Sales Manager at our station. I am also the EEO person who, in order to be sure it is done right and being unable to afford someone who can do this full-time job, has to keep up with the status of our hiring, advertise in all the proper places, screen the applicants, interview the applicants, and make the final hiring decision. It is an enormous task. Of all the writing and advertising we have done to try to recruit minorities, we have the best luck with our two local universities and local high schools. We could quit the hundreds of letters to colleges, institutions, and job placement places today with little practical effect. The idea that we must advertise for part-time employees just like full-time is totally impractical. The thought that someone is going to travel 60 or 70 miles or 500 miles to work 4 or 5..or even 20 hours a week is not facing reality. Only 1 or 2 part-timers in over 28 years in this market have come from outside Lincoln parish..and in those cases, it only lasted till they could get jobs closer to home and then they were gone!

I attended an associational meeting a few years back and there was a representative from the FCC there..and he talked about "pools of qualified applicants" that we could choose from that included qualified minorities. The reality of the situation is that there is no such thing as a "pool" of qualified applicants of ANY race or creed that I have found. Yes, stations do get some applications from time to time...but at notime is there a "pool" of unemployed or employed qualified applicants at this radio station..waiting for us to decide to hire them or not. Even though we have done everything we know how to do to get qualified minority applicants as well as general applicants, you have to hire people when THEY are AVAILABLE ..they do not stay in "pools" for us to pick and choose at will. You may build a small pool of applicants when you have an opening, but it evaporates in a matter of days and you have to start over each time. We have found applicants simply do not respond to letters or ads that state that from time to time you have openings and we are an equal opportunity employer. Today's reality in small market radio is, it is increasingly difficult to find ANY qualified person to work of any race or gender and adding racial and gender preferences only makes the task more difficult.

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As a small market broadcaster, I should like to ask the Commission's consideration in changing a few of its procedures & rules. Such as raising its "less than 5 full-time employees" exemption to a "less than 15 full-time employees" exemption to give broadcasters some limited relief from the enormous paper work jungle on this issue as well as a more practical and appropriate means of putting a reasonable floor on this issue. Also, I believe it would be more advantageous and appropriate to raise the "less than 5% minorities" exemption to "less than 10%" for the same reason. I believe also, that adopting a success exemption..if a station is meeting or exceeding the FCC's parity processing guidelines, the stations should be relieved of paperwork requirements.

Our stations were instrumental in encouraging our state association to implement a "job bank" some years back. We feel stations that utilize these job banks should get special credit for doing so.

In closing, we have a commitment to increasing the participation of minorities in our industry..we WANT it to work out..it's good for the community..it's good to raise the level of achievement for ALL citizens. However, the kind of regulation we live with has little connection with the reality of the situation. I pray that you will find a solution that will satisfy all parties concerned. I appreciate your taking the time to review the matters I've brought up in this letter.

Sincerely,



Dan Hollingsworth, Mgr.

CC: to all other FCC Commissioners